

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
Yasmin Mohamed p/k/a Yasminah,

Plaintiff,

v.

Abel Makkonen Tesfaye p/k/a The Weeknd;
Guillaume Emmanuel de Homem-Christo and
Thomas Bangalter p/k/a Daft Punk; Martin
McKinney p/k/a Doc; Henry Walter p/k/a Cirkut;
Jason Quenneville p/k/a DaHeala, XO Records,
LLC; Republic Records; Universal Music Group;
William Uschold p/k/a WILL U; Tyrone
Dangerfield p/k/a TABOO!!; Squad Music
Group; and DOES 1-10,

Defendants.
----- x

Case No. 18-cv-8469 (JSR)

**DECLARATION OF DEFENDANT JASON QUENNEVILLE
IN SUPPORT OF MOTION TO DISMISS OR TRANSFER**

I, Jason Quenneville, declare and state:

1. I am over the age of 18 and have personal knowledge of the following facts and could competently testify to the following facts if called upon to do so.

2. I am a songwriter and record producer and am professionally known as Daheala.

3. I am a citizen of Canada, where I was born in 1982. I have lived in Los Angeles since 2017, under a United States visa issued to me, and I intend to continue to reside there.

4. I have never resided in New York and I have never been issued a New York driver's license. I do not own any property in New York.

5. I am a co-writer of the musical composition *Starboy* and was present when that musical composition was completed and recorded. The *Starboy* composition and sound

were created in 2016 at Conway Recording Studios, in Hollywood, California, by combining recordings provided by Guillaume Emmanuel de Homem-Christo and Thomas Bangalter, with contributions that Abel Tesfaye, Martin McKinney, Henry Walter and I provided. At Conway Recording Studios, these various contributions to the creation of *Starboy* were combined to create the musical composition and recording *Starboy*.

6. I have known Martin McKinney and Henry Walter for years and it is my understanding and belief that Martin resides in Toronto, Canada and Henry resides in California.

7. I entered into a written agreement with The Weeknd XO, Inc., in connection with the creation of the musical composition *Starboy*. That agreement provides that it will be governed by New York law. However, I signed it in Los Angeles County, California, and it refers to The Weeknd XO, Inc., as "c/o David Weise & Associates, 16000 Venture Boulevard, Suite 600, Encino, CA 91436.

8. I have never publicly performed *Starboy* and I did not participate in the promotion or marketing of *Starboy*. I did not do anything in New York having anything to do with *Starboy*.

9. To the best my recollection, I cannot think of anyone residing in New York who is a witness to the creation of the *Starboy* song or music video. To the best of my recollection, all of those people, except Mr. de Homem-Christo and Mr. Bangalter and Mr. McKinney, reside in California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 18, 2018.



JASON QUENNEVILLE